

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

Docket No. N2012-1

NATIONAL POSTAL POLICY COUNCIL
SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS GREG WHITEMAN (USPS-T-12) (NPPC/USPS-T12-11-12)
(January 31, 2012)

The National Postal Policy Council ("NPPC"), pursuant to rule 26 of the Commission's rules of practice, respectfully submits the following interrogatories, numbered (NPPC/USPS-T12-11 through 12) to United States Postal Service witness Greg Whiteman (USPS-T-12) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, please redirect to the appropriate witness.

Please contact the undersigned with any questions.

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Certificate of Service

I hereby certify that I have this 31st day of January, 2012, caused to be served the foregoing document upon the United States Postal Service and the Public Representative in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
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NATIONAL POSTAL POLICY COUNCIL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS GREG WHITEMAN (NPPC/USPS-T12-11-12)

NPPC/USPS-T12-11: Please refer to your responses to NPPC/USPS-T12-5 and 6.

- a. Are the four “Financial Services” organizations indicated in your response to NPPC/USPS-T12-5 the same companies as the four “Finance, Insurance or Real Estate” organizations indicated in your response to NPPC/USPS-T12-6?
- b. Did any of the four “Financial Services” organizations indicated in your response to NPPC/USPS-T12-5 provide responses regarding their use of the mail for Application “DD” – that is, “documents such as reports, contracts, policies, legal papers, etc.” as defined by witness Elmore-Yalch (USPS-T11 at 17)? If yes, please explain.
- c. Were any of the four “Financial Services” organizations indicated in your response to NPPC/USPS-T12-5 insurance companies?

NPPC/USPS-T12-12: Please refer to your response to NPPC/USPS-T12-9, where you state “a price increase or increase in the cost to use a service or product will not necessarily lead to a changed purchase decision.”

- a. Please describe the circumstances, other than a perfectly inelastic demand curve, in which a price increase or increase in the cost to use a product will not lead to a changed purchase decision?
- b. Do you believe that there are National Mailers whose demand for Presort Mail is perfectly inelastic?